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January 21, 2020

VIA ECF Letter

Hon. Frederic Block
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Jay Winegard v. Newsday LLC
Case No. 1:19-cv-04420-FB-RER

Dear Senior Judge Block:

As you are aware, we represent the Defendant, Newsday LLC (“Newsday” and/or “Defendant”), in connection with the above-referenced matter. We submit this letter jointly with Plaintiff’s counsel, Mitchell Segal, Esq., in accordance with Your Honor’s directive at the January 15, 2020 pre-motion conference to submit a proposed briefing schedule for Defendant’s motion to dismiss Plaintiff’s Complaint. The parties propose the following schedule:

1. Defendant’s motion to dismiss to be filed by February 28, 2020;
2. Plaintiff’s Opposition filed by April 10, 2020;
3. Defendant’s Reply filed by May 1, 2020.

Thank you for your consideration.

Respectfully submitted,

JACKSON LEWIS P.C.

/s/ Joseph J. DiPalma
Joseph J. DiPalma

cc: All counsel (via ECF)